UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI

VELMA BLY,

Plaintiff,

Case No. 16-790

v.

DIVERSIFIED CONSULTANTS, INC.

Defendant.
_______________________________________/

NOTICE OF REMOVAL

PLEASE TAKE NOTICE that pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, defendant, Diversified Consultants, Inc. (DCI), through undersigned counsel and pursuant to 28 U.S.C. §§ 1331, 1441, and 1446 *et seq*., hereby removes this action from the 16th Judicial Circuit Court, Jackson County, Missouri, to the United States District Court for the Western District of Missouri. In support of this Notice of Removal, DCI states as follows:

1. On June 6, 2016, plaintiff, Velma Bly (plaintiff), commenced a civil action in the 16th Judicial Circuit Court, Jackson County, Missouri, entitled and captioned *Velma Bly v. Diversified Consultants, Inc.*, Case No. 1616-cv-13912 (hereinafter the "State Court Action"). No further proceedings before the State Court have occurred.

2. In the Complaint, plaintiff alleges statutory causes of action against DCI under the Fair Debt Collection Practices Act (FDCPA), 15 U.S.C. § 1692, *et seq.* A true and correct copy of plaintiff's Complaint is attached hereto within the state court documents labeled as Exhibit "A." Therefore, this Court has jurisdiction over the State

Court Action pursuant to 28 U.S.C. § 1331 because plaintiff's Complaint alleges a cause of action arising under the laws of the United States. Because plaintiff affirmatively alleges violations of the FDCPA, the Complaint asserts a federal question under 28 U.S.C. § 1331 and is removable pursuant to 28 U.S.C. § 1441.

3. On June 20, 2016, DCI was served with a copy of the Summons and Complaint.

4. The time within which DCI is required by the laws of the United States, 28 U.S.C. § 1446(b), to file this notice of removal has not yet expired. This Notice of Removal is timely, having been filed within 30 days of the date on which DCI was served with plaintiff's Complaint. *See* 28 U.S.C. § 1446.

5. The 16th Judicial Circuit Court, Jackson County, Missouri is located within the United States District Court, Western District of Missouri. Therefore, venue for purposes of removal is proper pursuant to 28 U.S.C. § 89(b) because the United States District Court for the Western District of Missouri embraces the place in which the removed action was pending. 28 U.S.C. § 1441(a).

6. Written notice of this Notice of Removal of this action is being immediately provided to the 16th Judicial Circuit Court, Jackson County, Missouri. *See* Exhibit "B" attached hereto.

7. Written notice of this Notice of Removal of this action is being caused to be served on the plaintiff.

WHEREFORE, defendant, Diversified Consultants, Inc., gives notice that this action is removed from the 16th Judicial Circuit Court, Jackson County, Missouri, to the United States District Court for the Western District of Missouri.

Dated July 14, 2016.

Respectfully Submitted,

/s/ *Matthew R. Brunkhorst*
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Attorneys for Defendant,
Diversified Consultants, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on July 14, 2016 a copy of the foregoing was served electronically via CM/ECF on the following:

Brian E. Johnson, Esq.
Stecklein & Rapp, Chtd.
748 Ann Avenue
Kansas City, KS 66101

/s/*Matthew R. Brunkhorst*
Matthew R. Brunkhorst